



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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March 3, 2020

**VIA ECF**

Honorable Judge Jesse M. Furman  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Keith Drew v. City of New York, et al.  
18-CV-8529 (JMF)

Your Honor:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney assigned to the defense in the above-referenced matter. In that capacity, I respectfully write to request a brief adjournment of the Initial Conference, currently scheduled for March 13, 2020 at 11:00 a.m., to a date convenient for the Court<sup>1</sup>. Plaintiff consents to the above request.

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<sup>1</sup> I am available March 16, 2020, March 18, 2020, or March 19, 2020. Additionally, plaintiff advised me that March 16, 2020 would work best for him, though he is available any of those dates.

This request is necessary because the date directly conflicts with my scheduled participation at an all-day work-related event at a location outside of the office. If Your Honor grants the above request, attached is a Proposed Order to Produce for the Court's convenience.

Thank you for your consideration herein.

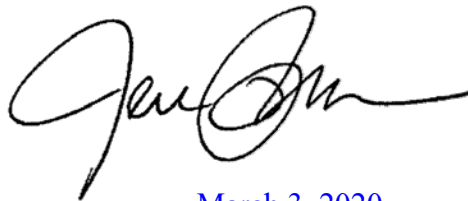
Respectfully submitted,

/s/ Giancarlo Martinez

Giancarlo Martinez  
Assistant Corporation Counsel  
Special Federal Litigation

**BY FIRST CLASS MAIL**  
cc: Keith Drew, #19A3129  
*Plaintiff Pro Se*  
Mid-State Correctional Facility  
9005 Old River Road  
P.O. Box 2500  
Marcy, NY 13403

Application GRANTED. The initial conference is RESCHEDULED to **March 16, 2020, at 11:00 a.m.** Counsel for Defendants shall (1) transmit this endorsed letter and the attached order to the Warden of the Mid-State Correctional Facility; (2) contact the Mid-State Correctional Facility to arrange the call and to determine the telephone number at which Plaintiff will be reachable at the above time and date; and (3) telephone the Court with Plaintiff on the line at the time and date of the conference. The parties are reminded to submit the pre-conference materials described in the Court's prior Order, ECF No. 58, by **Thursday of the week prior to the conference**. The Clerk of Court is directed to terminate ECF No. 59. SO ORDERED.



March 3, 2020

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
Keith Drew,

Plaintiff,

**ORDER TO PRODUCE**

18 CV 8529 (JMF)

- against -

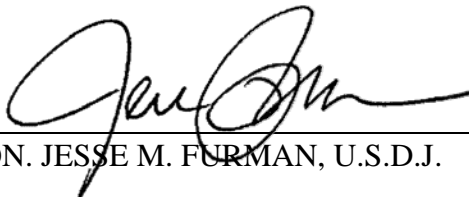
City of New York, et al.,

Defendants.  
-----X

JESSE M. FURMAN, United States District Judge:

**IT IS HEREBY ORDERED:** that the Superintendent or other official in charge of the Mid-State Correctional Facility, located in Marcy, New York, produce inmate Keith Drew, DIN No. 19-A-3129, at a location within the facility with a telephone for the ordered telephone conference on March 16, 2020, at 11:00 a.m., and for so long thereafter, as the conference continues, and that plaintiff appear in such place as designated by the Superintendent or other official in charge of the Mid-State Correctional Facility so that he may attend the scheduled telephone conference.

Dated: New York, New York  
March 3, 2020

  
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HON. JESSE M. FURMAN, U.S.D.J.